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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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H&H METALS CORP.,

MISC. CASE NO. 20-390

PETITIONER/JUDGMENT CREDITOR,

VS

GULSHAN KHANCHAND PANJWANI
AND MONA PANJWANI,

**NOTICE OF MOTION TO
COMPEL SUBPOENA
RESPONSES**

RESPONDENTS/JUDGMENT DEBTOR.

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PLEASE TAKE NOTICE that upon the attached Declaration of Charles L. Rosenzweig, Esq., dated November 13, 2020, and the memorandum of law submitted in support of this motion, petitioner/judgment creditor H&H Metals Corp. (“H&H”) will move the Court at 500 Pearl Street, New York, N.Y. 10007, on December 7, 2020, at 10:00am, or as soon thereafter as counsel can be heard for an order pursuant to Fed. R. Civ. P. 37 (i) compelling respondent/judgment debtor, Gulshan Khanchand Panjwani (“Panjwani”), to comply with H&H’s Subpoena to Testify at a Deposition and to Produce Documents, dated March 3, 2020 and (ii) compelling respondent, Mona Panjwanito (“Mona”) to produce documents in accord with H&H’s Subpoena to Produce Documents, dated March 5, 2020, and for an order pursuant to Fed.R.Civ.P. 45(g) to hold Panjwani and Mona in contempt for failing without adequate excuse to obey the respective subpoenas served on them, and for such other and further relief as this Court may deem proper and just.

Dated: White Plains, New York
November 17, 2020

DELBELLO DONNELLAN WEINGARTEN WISE &
WIEDERKEHR, LLP

By: /Charles L. Rosenzweig/
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Mrs. Mona Panjwani
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